

**CLIFTON BUDD & DeMARIA, LLP**  
ATTORNEYS AT LAW

THE EMPIRE STATE BUILDING  
350 FIFTH AVENUE, 61ST FLOOR  
NEW YORK, NY 10118

TEL 212.687.7410  
FAX 212.687.3285  
WWW.CBDM.COM

June 10, 2019

**VIA ECF**

Honorable A. Kathleen Tomlinson  
United States Magistrate Judge  
United States District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

Re: *Ajay Bahl v. New York College of Osteopathic Medicine of New York  
Institute of Technology, et al.*, 14-CV-04020 (AKT)

Dear Judge Tomlinson:

This firm represents Defendant New York Institute of Technology (“NYIT”), improperly named herein as New York College of Osteopathic Medicine of New York Institute of Technology, in the above-referenced action. I write on behalf of NYIT to respectfully request a one-week adjournment of the parties’ deadlines to submit a proposed joint expert discovery schedule and proposed summary judgment briefing schedule from June 12, 2019 to June 19, 2019. NYIT also respectfully requests a one-week adjournment of its deadline to submit a one-page letter setting forth its proposed basis for summary judgment from June 12, 2019 to June 19, 2019.

The parties have been working cooperatively to finalize the scope of proposed expert discovery in order to submit the proposed joint letter. Unfortunately, Stefanie Toren, counsel for NYIT, learned yesterday that there was a death in her family, requiring her to be in Atlanta through Friday as the funeral is on Wednesday. While we recognize that this is the third request for an extension<sup>1</sup> to submit a proposed joint expert discovery schedule, the requested extension would permit counsel time to finalize review of proposed expert discovery and summary judgment schedules with our client upon Ms. Toren’s return. Counsel for Plaintiff consents to this request.

Thank you for Your Honor’s consideration of NYIT’s request.

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<sup>1</sup> The two prior requests were made jointly by the parties and granted by the Court.

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Respectfully Submitted,

CLIFTON BUDD & DEMARIA, LLP  
*Attorneys for New York Institute of  
Technology*

By:



Douglas P. Catalano  
Stefanie R. Toren  
Stephen P. Pischl

cc: **VIA ECF**

Jason H. Ehrenberg, Esq.  
Peter K. Tompa, Esq.